

**From:** [Larryafd](#)  
**To:** [Harrington, Dwayne](#)  
**Subject:** Re: EPA update  
**Date:** Sunday, July 10, 2016 2:24:19 PM

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That will work. The Sooner the pumpdown the better.

Sent from my iPhone

On Jul 10, 2016, at 2:21 PM, Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)> wrote:

We've discussed that with the VFD. I'll talk with them tomorrow

Sent from my iPhone

On Jul 10, 2016, at 2:00 PM, Larryafd <[charger22@aol.com](mailto:charger22@aol.com)> wrote:

I agree that everything is a band aid at this point. If that relief valve lifts , it will blowing off for a long time. The other option is to put an unmanned monitor (blitz fire ) in the street connected to a fire hydrant on the corner and set it to a fog pattern In the event of a release, you just have to open the hydrant to knock down the vapors. Fd has a blitz fire that can be used. No risk to responders and reduce off site risk too

Thoughts?

Larry

The only safe way is pump it out now

Sent from my iPhone

On Jul 10, 2016, at 12:21 PM, Harrington, Dwayne <[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)> wrote:

What do you think ?

Sent from my iPhone

Begin forwarded message:

**From:** Peter Johnson  
<[pjohnson@gesoncall.com](mailto:pjohnson@gesoncall.com)>  
**Date:** July 10, 2016 at 12:18:01 PM EDT  
**To:** "Harrington, Dwayne"  
<[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>, Jay

Robertson <[jrobertson@gesoncall.com](mailto:jrobertson@gesoncall.com)>,  
Daniel Johnson <[djohnson@gesoncall.com](mailto:djohnson@gesoncall.com)>  
**Cc:** "Norrell, Neil" <[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Subject: RE: EPA update**

Tarping of the condensers would limit the immediate exposure and migration of a release from the condensers, but this will not limit or mitigate the hazard of the ammonia itself. In some ways, I would think that allowing a relief valve that is at a greater height would be a little more safe in terms of exposure as we would not be forcing the vapors to the ground level and allowing them to migrate from there. There really is no good option to this other than to have the system deactivated and drained, everything else at this point is merely a band-aid patch.

Peter

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**From:** Harrington, Dwayne  
[<mailto:Harrington.Dwayne@epa.gov>]  
**Sent:** Sunday, July 10, 2016 11:18 AM  
**To:** Peter Johnson <[pjohnson@gesoncall.com](mailto:pjohnson@gesoncall.com)>;  
Jay Robertson <[jrobertson@gesoncall.com](mailto:jrobertson@gesoncall.com)>;  
Daniel Johnson <[djohnson@gesoncall.com](mailto:djohnson@gesoncall.com)>  
**Cc:** Norrell, Neil <[Norrell.Neil@epa.gov](mailto:Norrell.Neil@epa.gov)>  
**Subject:** Fwd: EPA update

Tarping the condenser area to contain vapors.

What do you think?

Sent from my iPhone

Begin forwarded message:

**From:** [charger22@aol.com](mailto:charger22@aol.com)  
**Date:** July 10, 2016 at 11:09:41 AM EDT  
**To:** [rpagnini@vinelandcity.org](mailto:rpagnini@vinelandcity.org),  
[rtonetta@vinelandcity.org](mailto:rtonetta@vinelandcity.org),  
[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)  
**Subject: Re: EPA update**

Chief

We could use some salvage covers or Home Depot type tarps over the top of the condensers and tie them at the bottom and contain any vapor which may be released. It would be contained to a very small area and stop a major off site release

I have done this before to contain a leak

Larry

-----Original Message-----

From: Pagnini Robert  
<[rpagnini@vinelandcity.org](mailto:rpagnini@vinelandcity.org)>  
To: charger22  
<[charger22@aol.com](mailto:charger22@aol.com)>; Tonetta  
Richard  
<[rtonetta@vinelandcity.org](mailto:rtonetta@vinelandcity.org)>;  
Harrington, Dwayne  
<[Harrington.Dwayne@epa.gov](mailto:Harrington.Dwayne@epa.gov)>  
Sent: Sun, Jul 10, 2016 11:02 am  
Subject: RE: EPA update

Received and noted. I see the issues with the relief valves. Would it be possible to build a hood type system that could encapsulate the relief valves without compromising the valves or piping. Then direct the encapsulating hood device to discharge to the scrubber in the event of a relief valve failure? This would have to be designed to be free standing with its own supports as to not put any weight or strain on the relief valves or piping.

Sent from my Windows Phone

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From:  
[charger22@aol.com](mailto:charger22@aol.com) <<mailto:charger22@aol.com>>  
Sent: 7/10/2016 9:40  
To: Tonetta  
Richard <<mailto:rtonetta@vinelandcity.org>>;  
Pagnini  
Robert <<mailto:rpagnini@vinelandcity.org>>  
Subject: EPA update

Here is the EPA update from yesterday,, Larry  
Update for 7/9/16:

Two of the four relief discharges have been secured and routed to discharge to the scrubber, however, two pressure relief valves were not able to be secured. The state of deterioration of the vapor pressure relief valves was found to be so severe that a secure connection is not possible. The two direct-discharge liquified ammonia direct-discharge vents were successfully attached to the scrubber.

After a review of the refrigeration system, EPA's refrigeration contractor determined that the two vapor relief valves could not be isolated to be replaced with new valves even temporarily because the overall refrigeration system is so deteriorated as to be inoperable, and even under the best conditions the attempted operation would nevertheless result in a significant release (greater than 100 lbs) of residual ammonia in the condensers, which would be an unacceptable risk to the technicians performing the work, not to mention the surrounding community. In addition, even if the valves could be safely removed, should their connecting screw-threads to the condensers be similarly deteriorated, which is highly likely, they could not be replaced and that would essentially shut the system down permanently.

The refrigeration contractor also stated that, due to the design and deteriorated state and resulting inoperability of the system, a failure of one of the relief valves would ultimately result in the release from the valve of the entire contents of the ammonia in the system (currently roughly estimated at ten to twelve thousand pounds), which could not be secured because of the state of the system, and the resulting release could possibly last up to two weeks (10,000-12,000 lbs ammonia at 119 psi through a 1/2 vent line).

The facility owner told EPA that our

and our contractors' activities on site were starting to make him nervous.

The relocation of the seven residences adjacent to the facility has been extended through Tuesday, and possibly (probably) beyond, pending further assessment and developments. PAD is preparing an updated fact sheet.

The VFD has lifted the shelter in place standby advisory for neighborhood, however, the emergency notifications and instructions for the public in the event of a release remain intact. IMAAC release projections will be revised for current worst-case conditions.

EPA refrigeration system and structural engineering contractors will be on site on Monday 7/11/16 to assess the refrigeration system and the building to determine what actions, including immediate emergency actions, are required to at least stabilize the situation, including what options are available to address the non-secured pressure relief valves on the condensers.

RST continues 24-hr air monitoring.